



Global Ghost Gear Initiative Secretariat

c/o World Animal Protection
222 Gray's Inn Road
London, UK
WC1X 8HB

September 17, 2018

Bradley Phillip, Chair
WCPFC FAD Management Options Intersessional Working Group

Dear Mr. Phillip,

I am writing on behalf of the Global Ghost Gear Initiative (GGGI; www.ghostgear.org), a cross-sectoral alliance committed to driving solutions to the problem of lost and abandoned fishing gear worldwide. GGGI has 92 members that represent the fishing, retail, supply chain, and environmental sectors, and several of our members participate heavily at the WCPFC. We also have the stated support of 12 governments from around the world, including 6 who are members of the WCPFC (New Zealand, Samoa, Tonga, Vanuatu, Tuvalu, and Palau), as well as the support from high-level multilateral organizations including EU DG MARE, FAO, UNEP and OSPAR.

I'm writing to support your efforts as Chair of the WCPFC FAD Management Options Working Group to find ways forward on implementing a requirement for non-entangling FADs in the WCPFC Convention Area and to share with you a set of best practices with respect to FAD use and reduction of ghost fishing and ghost gear that GGGI has developed over the last two and a half years after extensive research and consultation with its members, certification schemes and industry.

As you know, WCPFC is the only tropical tuna RFMO that does not yet require use of non-entangling FADs in the tropical purse seine fishery. Since WCPFC manages the world's largest tropical tuna purse seine fishery, the largest number of FAD deployments in any tuna RFMO is likely made within its waters. This lack of a non-entangling requirement puts an incredible amount of marine wildlife at risk. Recent expeditions by organizations in the region have observed dozens of FADs beached or grounded in sensitive marine habitats in uninhabited places, several with evidence of wildlife entanglement.

Mitigating ghost fishing and other detrimental impacts like this and from other fisheries in a collaborative way is the primary motivation behind the GGGI. We are encouraged that

WCPFC is examining guidelines for non-entangling FADS at the next FAD Working Group meeting, and we support policy options that require a complete shift to FADS designed with the lowest risk of entanglement, in as short a time period as possible. To date, there is no evidence that such a shift would reduce profitability or efficiency in the fishery. We also support the suggested move toward biodegradable FADS, a transition that would hopefully reduce the degree to which FADS contribute to the growing marine debris problem in the Pacific. Both of these issues are included in the Best Practice Framework for Fishing Gear Management (BPF) that GGGI recently launched,ⁱ after extensive research and consultation with certification schemes and industry by the GGGI Define Best Practice and Inform Policies Working Group. The document covers a wide range of stakeholder groups, from all regions of the world, including all of the most impactful fishing gears, operational strategies, and vessel types. Other included best practices that focus specifically on use of FADS by fishing operators include:

- Marking FADS and FAD components with ownership details, consistent with the Voluntary Guidelines for the Marking of Fishing Gear,ⁱⁱ adopted at the FAO's Committee on Fisheries in July 2018;
- Equipping all FADS with a tracking device and sharing real-time FAD location with relevant authorities;
- Recovering all deployed FADS and avoiding their abandonment;
- Ensuring there is adequate storage space on boats/vessels for recovered FADS;
- Collaborating with local partners to recover lost or abandoned FADS that are at high risk of beaching or grounding in sensitive nearshore habitats.

As your work progresses, we encourage you and the members of the working group to consider some of the above best practices, where they are not already required by WCPFC. Collaboration with local partners to intercept lost or abandoned FADS is something that the GGGI is particularly interested in. This activity has shown some early signs of success in the Seychelles.ⁱⁱⁱ The GGGI has also conducted a preliminary pilot study on the marking and tracking of FADS in Vanuatu to inform the FAO Gear Marking Guidelines. The above points are summarized in a FAD factsheet, developed by the GGGI (attached). Given the expertise of the GGGI, including supply chain experts, we hope that sharing our best practices document and FAD factsheet will be useful for you and the FAD Working Group.

We recognize that FAD tracking (including the sharing of real time FAD tracks and locations) is already undertaken by Parties to the Nauru Agreement, and we further encourage WCPFC to adopt this practice for the wider Convention Area. We believe that knowing a FAD's location may reduce the likelihood of ghost fishing by this gear, particularly where tracking information can be shared with local partners, as has been trialled in the Seychelles. Tracking also helps WCPFC and other relevant authorities to better understand how many FADS are being deployed in the region and how many are being lost or abandoned. This information will serve to better inform future FAD policies at WCPFC. We applaud the WCPFC's decision last year to collect inventories of FAD buoys on vessels and urge it to continue to improve data collection on FADS.

Thank you for your time and for taking up the goal of requiring non-entangling and biodegradable FAD design for use in WCPFC fisheries. Successful implementation of this and other best practices for reducing ghost fishing in FAD fisheries will be good for wildlife in the region, without reducing profitability or efficiency in the FAD fishery.

Yours sincerely,



Ingrid Giskes
Chair, Global Ghost Gear Initiative

ⁱ http://www.ghostgear.org/sites/default/files/attachments/wap_gear_bp_framework_part_2_mm_lk-2017.10.23.pdf.

ⁱⁱ <http://www.fao.org/3/MX136EN/mx136en.pdf>

ⁱⁱⁱ <http://opagac.org/en/the-spanish-tuna-fleet-is-the-first-one-that-guarantees-the-elimination-of-beaching-events-from-fads-in-the-seychelles/>